

## Public comments pertaining

To ○ Boccardi, Vanna

On behalf on the Anaconda Sportsmen's Club, we would like to offer the following comments regarding the draft Fleeceer WMA Grazing Lease Renewal EA.

First we would like to definitely lend our support to your efforts regarding overall management of the Fleeceer Mountain WMA. We think that maintaining goals of good or excellent vegetative conditions on the WMA must be maintained. Wildlife habitat , especially elk habitat must be first and foremost on the WMA, but it certainly does not eliminate other multiple uses such as livestock grazing, if done properly.

We offer the following specific comments that if incorporated into the final document will make it a stronger analysis.

1. Total aum's in the various pastures are never discussed. A listing of total carrying capacity by pasture and in aggregate would provide a little more context for the analysis.

2. In support of the above comment showing the percentage of the total carrying capacity that is reserved for wildlife would be very beneficial to the general public during their review.

3. A map or series of maps showing an average rest rotation cycle in conjunction with the chart (Table 1) found on page 7 would also be helpful to visualize the overall grazing plan.

4. Their is little to no discussion of the cumulative effects of the grazing plan in a larger landscape. It is mentioned that grazing is also conducted in conjunction with adjacent Forest Service and private lands. It would be nice to what condition those lands are as well.

Thank you for the opportunity to review the draft EA and we look forward to seeing the Final.

Chuck Otto for the ASC Board of Directors and club members.

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This e-mail was generated from the 'Fleeceer Wildlife Management Area Grazing Lease Renewal' Public Notice Web Page.

Good Afternoon Vanna,

I want to thank you for the opportunity to review the Fleeceer WMA Grazing EA and would like to take a moment to provide a few comments. I would like to start by saying that the Forest Service supports the continued grazing use on the Fleeceer WMA as it relates to the cooperative coordinate grazing system between MTFWP, United States Forest Service (USFS) and the respective private lands owner. The Forest Service is committed to continuing our management of the NFS lands involved in this agreement.

Generally speaking: As stated in the EA total removal of all grazing on the Fleeceer WMA (Alternative C) will likely result in a need to adjust the grazing management on the Fleeceer Grazing allotment on National Forest System (NFS) administered lands. We cannot say what that adjustment would look like at this time, however, it may result in the long term loss in available forage for wintering elk. It is unclear what the long term implication to those NFS lands would be if Alternative B were selected, but it to could result in some loss of available forage elk. We agree with FWP that Alternative A would be the best option for the long term management of the resources across the larger landscape in the Fleeceer area.

Although we agree that Alternative A is the best alternative, and we understand that this is a short term plan to adapt to potential changes in the private land management, we would ask you to consider the following: Utilizing the MTFWP "Pond Pasture" on an annual basis. I believe this would provide for additional grazing opportunities to improve the forage availability and for wintering elk while we work on improving the ecological conditions in the USFS Antelope and Enclosure pastures by reducing the impacts from Spotted Knapweed. The USFS has recently started to take a more aggressive approach to noxious weed management in this area to address this issue. These pastures appear to have some decline in abundance in desirable native species composition. A more detailed examination will need to be made by the USFS to determine to what extent if any decline in the desirable species has occurred. From observations of wintering elk use it seems as though these two pastures receive the largest percentage of use from the elk and antelope herds of all the NFS lands in the area.

While smooth broom can be used as a forage base it can become very unpalatable late in the year and neither cattle nor elk prefer it once it begins to accumulate the standing dead usually within a growing season or two. In my experience I have found that it is best grazed annually to minimize the accumulation of this woody material. Providing some managed grazing opportunities annually may be the best way to use the smooth broom within the Pond Pasture to continue to provide quality forage for wintering elk annually and long term.

Based upon field observations on the USFS, Fleeceer Grazing allotment it appears that the coordinated grazing system has been largely successful in helping to maintain the ecological stability of the larger landscape. We look forward to continuing our cooperative partnership with MTFWP and the USFS in managing the grazing use on the Fleeceer WMA and the USFS Fleeceer Grazing allotment.

*Lucas*



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Public Comment: Fleeceer Wildlife Management Area Grazing Lease Renewal

To ○ Boccardi, Vanna

All grazing allotments should be retired. We must protect streams and habitat. Grazing is a fire hazard as it encourages cheat grass. There is nothing good about tax payers subsidizing grazing. End these allotments.

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January 28, 2019

Vanna Boccadori  
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Montana Fish, Wildlife and Parks  
1820 Meadlowlark Lane  
Butte, MT 59701  
*Sent via email only to vboccadori@mt.gov*

**Re: Fleeceer Cattle Company Comments to December 2018 Draft Environmental Assessment – Fleeceer Wildlife Management Area Grazing Lease Renewal**

Dear Ms. Boccadori:

Please accept the following comments regarding the December 2018 Draft Environmental Assessment (“Draft EA”) for the Fleeceer Wildlife Management Area Grazing Lease Renewal on behalf of Fleeceer Cattle Company.

Fleeceer Cattle Company supports Proposed Action - Alternative A versus the other Alternatives. However, Fleeceer Cattle Company proposes revisions to the parameters of the lease agreement to address changes to Fleeceer Cattle Company’s ranching operation and continued issues with significant number of elk remaining on Fleeceer Cattle Company private lands for significant periods of time.

## **Purpose of the Coordinated Grazing System**

As indicated in the Draft EA, the purpose of the Fleeceer WMA Coordinated Grazing System historically has been and currently is to meet the need for quality winter range for elk in the Fleeceer area, and to minimize adverse impacts to adjacent private property. Elk continue to enjoy high quality winter range on Fleeceer Cattle Company private property, however, the impacts of elk on Fleeceer Cattle Company private property continue to outweigh the benefits of the grazing lease to Fleeceer Cattle Company.

## **Changes to Ranching Operation**

In 2018, Fleeceer Cattle Company spun off from its predecessor Smith 6 Bar S Livestock. The property is still managed by the same person who managed the property under Smith 6 Bar S, Meg Smith. This change in the larger ranching operation is important to note because it has altered the business needs and challenges associated with this property. Fleeceer Cattle Company is more wholly dependent upon lands surrounding the Fleeceer WMA than Smith 6 Bar S was in the past.

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Approximately 200 cows will graze on Fleecer Cattle Company lands near Fleecer WMA year-round and not just during the summer as in years past.

**Elk Continue to Winter on Fleecer Cattle Company**

Although FWP owns thousands of acres bordering Fleecer Cattle Company, and recently has acquired more, elk seem to prefer to winter on Fleecer Cattle Company lands. These private lands are lower in elevation than most of the acreage owned by FWP and have been managed with Best Management Practices, making this private range resource the most desirable and beneficial for wildlife use. While new habitat is available, elk habits do not appear to be changing.

Fleecer Cattle Company continues to experience 800+ elk on its private property throughout the winter and early spring months. Elk use every acre of Fleecer Cattle Company's 4,800+ acres, NOT just the three pastures and 1,920 deeded acres and 640 State lease acres described in the Draft EA. The benefit the State derives from Fleecer Cattle Company's private property ownership in the area and adjacent to the Fleecer WMA is understated in the Draft EA.

**The Draft EA Should Be Revised to Account for Changes to Fleecer Cattle Company's Ranching Operation, and Continued Issues Regarding Elk Habits and Elk Numbers**

The proposal encompassed by this Draft EA should be revised to account for the realities on the ground related to the recent changes to the ranching operation, and regarding elk habits and numbers.

Regarding the goal "to use coordinated resource management across ownerships to alleviate conflict between wildlife and agricultural land use," the Draft EA, Section 7 – Need for Proposed action, lists six historical objectives. Fleecer Cattle Company believes that three objectives require significant further consideration and improvement: 3) "minimize impact of winter and spring use by elk on private land by providing adequate habitat on public lands," 5) "increase cattle grazing potential," and 6) "maintain optimum level of livestock production on [Fleecer Cattle Company] lands." Fleecer Cattle Company notes that objective 5) "increase cattle grazing potential" is omitted from the objectives for the proposed action under this Draft EA, and requests that it be included again in the Final EA.

The Proposed Action does not account for fewer needed AUMs by Fleecer Cattle Company and the wisdom of grazing the "Pond" brome grass pasture more frequently. This ground needs to be grazed frequently due to the nature of the brome grass species as an introduced, non-native, and high production species. With Fleecer Cattle Company's fewer cattle numbers, this Pond Pasture could be and should be grazed yearly, or three out of the four years of the lease. It is important to note that Fleecer cattle are uniquely able to efficiently convert this brome grass at the optimal time for the WMA because of Fleecer's atypical fall calving schedule.

Because Fleecer Cattle Company is exchanging grazing for rest rotation of its private pastures, the grazing allowance should not alleviate FWP of its obligation to mitigate the



continuing and worsening issues of elk overrunning Fleecer Cattle Company private lands. The Final EA should address the elk numbers that will be expected to be allowed to winter on Fleecer Cattle Company lands. The Final EA should address allowed actions such as hazing or herding of elk off of Fleecer Cattle Company lands and the implementation of damage hunts.

As stated in the Draft EA, the grazing plan alone, especially when already traded for through the rest and rotation of privately-owned pastures, is not enough to alleviate issues that Fleecer Cattle Company continues to experience. Under the proposed plan, and the new ranching operation at Fleecer, only half as many cattle will graze the limited time period under the Draft EA. Yet, no change will be made to the elk numbers and damage that Fleecer Cattle Company is expected to withstand.

Fleecer Cattle Company needs relief from the impacts of elk, not just for the viability of the ranching operation, but also for the preservation of the soil and grass resource on the ranch. The cattle need the grass, the elk need the grass, and the grass needs rest in order to maintain strong root systems.

Fleecer Cattle Company intends to continue to work with FWP, however, Fleecer will not continue to accept the lopsided exchange represented in this Draft EA indefinitely. Other options are available to Fleecer Cattle Company to preserve its interest that may be contrary to FWP goals for elk management.

The Final EA should allow flexibility for Fleecer Cattle Company and FWP to explore new ideas to figure out how to change behavior patterns in wintering elk so they do not spend so much time on Fleecer Cattle Company's private property. The lease agreement between FWP and Fleecer Cattle Company should include a contingency plan to allow more grazing by Fleecer on the WMA to account for particularly bad winters when elk spend more time on the lower elevations of the Fleecer Cattle Company's private lands. Damage hunts and hazing or herding opportunities to move elk from private lands must be part of this plan.

Sincerely,

MOULTON BELLINGHAM PC

By   
Ariel Overstreet-Adkins